

# **EXHIBIT A**

1 Stephen M. Doniger (SBN 179314)  
2 stephen@donigerlawfirm.com  
3 Kelsey Schultz (SBN 328159)  
4 kschultz@donigerlawfirm.com  
5 DONIGER / BURROUGHS  
6 603 Rose Avenue  
7 Venice California 90291  
8 Telephone: (310) 590-1820

7 Reeder McCreary, LLP  
8 11766 Wilshire Blvd., Suite 1470  
9 Los Angeles, CA 90025  
10 Telephone: (310) 861-2470  
11 Facsimile: (310) 861-2476  
12 Email: [mark@reeder-mccreary.com](mailto:mark@reeder-mccreary.com)

11 *Attorneys for Plaintiff Lynne Freeman*

12  
13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 LYNNE FREEMAN, an individual,

16 Plaintiff,

17 v.

18  
19 AMAZON.COM, INC., a Delaware  
20 Corporation; BARNES & NOBLE  
21 BOOKSELLERS, INC., a Delaware  
22 Corporation; TARGET BRANDS, INC., a  
23 Minnesota Corporation; WALMART, INC., a  
24 Delaware Corporation; COSTCO  
25 WHOLESALE CORPORATION, a  
26 Delaware Corporation; and DOES 1-10,  
27 Defendants.  
28

Case No.:

COMPLAINT FOR COPYRIGHT  
INFRINGEMENT

Jury Trial Demanded

1 Lynne Freeman, by and through her undersigned attorneys, hereby prays to this  
2 honorable Court for relief based on the following:

3 **JURISDICTION AND VENUE**

4 1. This action arises under the Copyright Act of 1976, Title 17 U.S.C., § 101  
5 *et seq.*

6 2. This Court has federal question jurisdiction under 28 U.S.C. §§ 1331 and  
7 1338 (a).

8 3. Venue in this judicial district is proper under 28 U.S.C. § 1391(c) and  
9 1400(a) in that this is the judicial district in which a substantial part of the acts and  
10 omissions giving rise to the claims occurred.

11 **PARTIES**

12 4. Plaintiff Lynne Freeman (“FREEMAN”) is an individual who is a  
13 resident of Alaska and also has a home in this judicial district.

14 5. Plaintiff is informed and believes and thereon alleges that Defendant  
15 AMAZON.COM, INC. (“AMAZON”) is a Delaware corporation with its corporate  
16 headquarters located in Seattle, Washington, and has significant contacts with this  
17 district, including operating a plethora of corporate offices, a movie production  
18 studio, twenty-three shipping/sorting facilities and a Los Angeles tech hub, and  
19 conducting a massive amount of business here such that it is “at home” in this  
20 district. Further, Amazon operates physical stores in this judicial district through  
21 which it has committed the acts of infringement complained of herein.

22 6. Plaintiff is informed and believes and thereon alleges that Defendant  
23 BARNES & NOBLE BOOKSELLERS, INC. (“B&N”), is a Delaware Corporation  
24 with its principal place of business in New York, and operates retail stores, and has  
25 committed the acts of infringement complained of below, in this judicial district.

26 7. Plaintiff is informed and believes and thereon alleges that Defendant  
27 TARGET BRANDS, INC., is a Minnesota Corporation with its principal place of  
28 business located at 1000 Nicollet Mall, Minneapolis, Minnesota 55403, and

maintains physical stores in this jurisdiction through which it has committed the acts of infringement complained of herein.

8. Plaintiff is informed and believes and thereon alleges that Defendant WALMART, INC., is a Delaware Corporation, with its principal place of business located in Bentonville, AK, and maintains physical stores in this jurisdiction through which it has committed the acts of infringement complained of herein.

9. Plaintiff is informed and believes and thereon alleges that Defendant COSTCO WHOLESALE CORPORATION (“COSTCO”), is a corporation organized and existing under the laws of the state of Delaware with its principal place of business located at 999 Lake Drive, Issaquah, Washington 98027, and which maintains stores in this jurisdiction through which the infringement at issue in this case has occurred.

10. Plaintiff is informed and believes and thereon alleges that Defendants DOES 1 through 10, inclusive, are other parties not yet identified who have infringed Plaintiff’s copyrights, have contributed to the infringement of Plaintiff’s copyrights, or have engaged in one or more of the wrongful practices alleged herein. The true names, whether corporate, individual or otherwise, of Defendants 1 through 10, inclusive, are presently unknown to Plaintiff, which therefore sues said Defendants by such fictitious names, and will seek leave to amend this Complaint to show their true names and capacities when same have been ascertained.

11. Plaintiff is informed and believes and thereon alleges that at all times relevant hereto each of the Defendants was the agent, affiliate, officer, director, manager, principal, alter-ego, and/or employee of the remaining Defendants and was at all times acting within the scope of such agency, affiliation, alter-ego relationship and/or employment; and actively participated in or subsequently ratified and/or adopted each of the acts or conduct alleged, with full knowledge of all the facts and circumstances, including, but not limited to, full knowledge of each violation of Plaintiff’s rights and the damages to Plaintiff proximately caused thereby.

## **CLAIMS RELATED TO FREEMAN'S WORK**

12. In 2009, FREEMAN wrote a young adult paranormal fantasy romance manuscript originally entitled *Blue Moon Rising*, but later renamed *Masqued*. The manuscript was about a protagonist who moves to Alaska from San Diego to live with her last two remaining relatives—who are supernatural witches, although she doesn't know it—after a tragic accident killed her family. The protagonist believes she's human, but is not, learns about a supernatural world she never knew existed as she falls in love with a dangerous boy with dark secrets, and learns of a supernatural war and that her purpose is to restore the balance among the warring factions.

13. In December of 2010 FREEMAN hired Emily Sylvan Kim of Prospect Agency, LLC as her literary agent to assist her with finding a publisher for her manuscript. Kim told FREEMAN she liked her manuscript very much, loved her writing, and that only a few minor changes would be required before the book would be ready to send to other publishers.

14. Despite the foregoing comment by Kim, FREEMAN spent over three years having frequent and lengthy phone calls with Kim, and constantly exchanging e-mails, the focus of which were comments and detailed questions that Kim had regarding the manuscript, which led to FREEMAN repeatedly revising it and creating new material. Kim requested pitch notes, chapter outlines, chapter summaries, synopses, query letters, FREEMAN's notes used to create the manuscript, her plans for the book series; she even asked FREEMAN to write letters for her to use with potential publishers about the books. FREEMAN complied, and over the course of their relationship created over forty (40) versions of the manuscript and numerous notes which she sent to Kim.

15. In late 2013, Kim told Freeman that she had no publishers to whom she could send her book, other than the few publishers to whom she had already sent it. Kim asked Freeman to provide a list of publishers and contacts who she thought might be interested. She also had Freeman write chapter outlines, pitch notes and

1 synopses, as well as letters of introduction for her to use to send to them. Freeman  
2 supplied Kim with everything she requested. However, she always thought it was  
3 strange that Kim asked for those materials.

4 16. In 2014, Kim told Freeman that if she could not write a contemporary  
5 romance book and give her something new, she would need to remove Freeman from  
6 her website. She told her that the Freeman manuscripts were a great story, but that  
7 they missed the market since young adult books and movies in this genre were  
8 oversubscribed, and that Freeman would need to wait until her son graduated from  
9 high school in 2021, to resubmit her original manuscript. Freeman gave Kim notes  
10 for a few proposed books, as well as some chapters. However, Freeman concluded  
11 that she did not want to write anything other than young adult fantasy and terminated  
12 her professional relationship with Kim.

13 17. Prior to and during the time Freeman worked with Kim, Kim was also  
14 the literary agent for Tracy Deeks-Elkenaney, aka Tracy Wolff (“Wolff”). At all  
15 relevant times Kim and Wolff have not only had an agent-client relationship but have  
16 been good friends, and Plaintiff is informed and believes that Kim shared Freeman’s  
17 work and ideas with Wolff.

18 18. Freeman met Wolff in the summer of 2012. At Kim’s request, Freeman  
19 attended the Romance Writers of America conference in Anaheim, California which  
20 took place July 24 through July 28, 2012. On the morning of the first day of the  
21 conference, Kim introduced Wolff to Freeman outside the hotel where Kim and  
22 Wolff were staying. Kim told Freeman that Wolff was an erotica writer, that she was  
23 speaking at the conference, that she was very proud of her, and that they were good  
24 friends. She introduced her to Freeman as “Tracy Deeks.”

25 19. At Kim’s urging, Freeman attended a talk that Wolff gave at the  
26 conference on erotic language in books. That same morning, Freeman rode with Kim  
27 and her other clients, including Wolff, from the hotel to the conference. During the  
28 ride, Kim asked each of her clients to talk about what they were working on or had

1 just completed. Freeman spoke briefly about Blue Moon Rising. During the ride to  
2 the conference, Freeman also answered a number of questions asked of her by Kim,  
3 such as how she got into writing, how she got the idea for the Freeman Manuscript,  
4 what made her decide to write a book and when specifically, she began writing the  
5 manuscript, as well as questions about living in Alaska, and what made her set her  
6 book in Alaska.

7         20. In 2020 the book *Crave*, supposedly written by Tracy Wolff, was  
8 published. *Crave* is also a young adult paranormal fantasy romance set in high school  
9 in Alaska, with a protagonist who moves to the state from San Diego, after a tragic  
10 accident killed her family. The protagonist also believes she's human, but is not, must  
11 navigate her way in the supernatural world she never knew existed while falling in  
12 love with a dangerous boy with dark secrets, and learns of a supernatural war and that  
13 her purpose is to restore the balance among the warring factions.

14         21. Since 2020 *Crave* has become a series with the next three books  
15 purportedly authored by Wolff published after *Crave*— *Crush*, *Covet* and *Court*—  
16 following the same characters as in Freeman's manuscript and built on storylines that  
17 mirror the subplots in the various versions of Freeman's manuscripts, notes, and  
18 outlines provided to Kim.<sup>1</sup> In addition to the similarities in plot, characters, dialogue,  
19 mood, theme, and pace, there are a substantial number of lifted scenes throughout the  
20 series, and an overwhelming number of similarities of non-genre-specific words,  
21 phrases, and language between the works, many of which occur in page number  
22 proximity between the various versions of Freeman's manuscripts and the *Crave*  
23 series of books, using Freeman's language, expression, plots, subplots, and  
24 characters. The books share seven character names in common, some of which are  
25 highly unusual, such as the Bloodletter, Marise, and Collin.

---

26  
27 <sup>1</sup> In November of 2021, a related book entitled *Katmere Academy: An insider's Guide* was published. Then in  
28 November of 2022 *Charm* was published as the fifth book in the *Crave* series. The sixth book, *Cherish*, is scheduled to  
be published later this year. While those books are not the subject of this lawsuit, this action is filed without prejudice to  
Plaintiff's right to pursue claims related to those books.

1           22. In response to a demand letter by Freeman’s counsel, an attorney for  
2 Entangled, the publisher of the *Crave* series, stated that Liz Pelletier, Entangled’s  
3 Chief Executive Officer and Publisher, “created the basic storyline for the *Crave*  
4 book series, selecting the writer, Tracy Wolff; not based on a prepared manuscript but  
5 due to her writing voice.” Through counsel, Pelletier claims that the “*Crave* book  
6 series was a collaborative project with Pelletier providing to Wolff in writing the  
7 main plot, location, characters, and scenes, and actively participating in the editing  
8 and writing process.”

9           23. Entangled admits to having received Freeman’s manuscript prior to the  
10 creation of the *Crave* series. And Kim told Freeman that she sent the manuscript to  
11 Stacy Abrams, an Editorial Director at Entangled. Ms. Abrams and Ms. Pelletier are  
12 listed in both *Crave* and *Crush* as the editors of both books.

13           24. The relevant versions of the Freeman Manuscript and the notes, outlines  
14 and other materials sent to Kim (sometimes hereinafter referred to as “Freeman  
15 Copyrighted Material,” *Blue Moon Rising*” or “BMR”) have been registered with the  
16 U.S. Copyright Office, under Certificates of Registration dated September 12, 2021,  
17 and numbered TXu002276330; TXu002282260; TXu002276335 and  
18 TXu002276337.

## 19 20                           **DEFENDANTS’ COPYRIGHT INFRINGEMENT**

21           25. Plaintiffs repeat and reallege the allegations contained in paragraphs 1  
22 through 24, above as if fully set forth herein at length.

23           26. Freeman, complying in all respects with the Copyright Laws of the  
24 United States, as proprietor thereof secured and owns the exclusive rights and  
25 privileges in and to the copyright in the Freeman Copyrighted Material, which  
26 contains a large amount of wholly original material and constitutes copyrightable  
27 subject matter under the laws of the United States.  
28



27. Defendants, and each of them, have advertised, sold, distributed, and profited from the sale of the books entitled *Crave*, *Crush*, *Covet*, and *Court*, purportedly authored by Tracy Wolff.

28. The books entitled *Crave*, *Crush*, *Covet*, and *Court* infringe the Freeman Copyrighted Material in that they constitute unauthorized derivatives of the Freeman Copyrighted Materials and copy without authorization protectable expression contained in the Freeman Copyrighted Material including the characters, plot, storyline, scenes, tempo, and language, as set forth below:

	<b>Blue Moon Rising Main Plot:</b>	<b>Crave Main Plot:</b>
a.	Story takes place at a public high school in Alaska. The school is in Anchorage, Alaska.	Story takes place at a private boarding school in Healy, Alaska. It was originally in Anchorage.
b.	The heroine is from San Diego.	The heroine is from San Diego.
c.	Teen heroine, almost 17, believes she is human.	Teen heroine, 17, believes she is human.
d.	She's something unique in the supernatural world; mixed bloodlines; a "Nyx."	She's something unique in the supernatural world; mixed bloodlines; a "gargoyle."
e.	She is a queen; she is a descendant of one of the twin goddesses.	In the series, she is a queen; descendant of one of the twin goddesses.

f.	Her supernatural purpose will be to restore “the balance;” she is a “protector.”	Her supernatural purpose will be to restore “the balance;” she is a “protector.”
g.	She lives with the only family she has left; her mom and aunt, and they are both witches.	She lives with the only family she has left; her uncle and cousin, and they are both witches.
h.	She believes her dad was human; he’s a werewolf.	She believes her dad was human; he’s a witch.
i.	She believes her mom is human; she’s a witch.	She believes her mom is human; she’s a gargoyle.
j.	Her parents were deeply in love.	Her parents loved one another a ridiculous amount.
k.	She comes to Alaska after an accident killed her father and grandparents when she’s 17.	She comes to Alaska after an accident killed her father and mother when she’s 17.
l.	She suffers anxiety and panic from the loss.	She suffers anxiety and panic from the loss.
m.	Her description of Alaska is negative in the beginning. She	Her description of Alaska is negative in the beginning. She says it “feels like the moon.”

	says it's "like living on the moon."	
n.	She feels shy, wants to fit in, ducks her head or chin.	She feels shy, wants to fit in, ducks her head.
o.	Heroine is smart, loves books, takes advanced classes.	Heroine is smart, loves books, takes advanced classes.
p.	Tea is a thing; heroine's aunt makes herbal teas. Tea was used to bind her magic.	Tea is a thing; heroine's mom made herbal teas. Tea was used to bind her magic.
q.	Heroine believes her father and grandparents were killed in an accident. Her grandparents were actually murdered by the vampire prince; her father is imprisoned by him.	Heroine believes parents were killed in an accident. They were actually murdered by the vampire prince's mate.
r.	Vampire prince wants to use heroine to resurrect his dead mate; he believes she will be the reincarnation of his dead mate once he converts her to a vampire	Vampire prince's mate wants to use heroine for a spell to resurrect her dead mate.

	because they look alike and are related by blood.	
s.	Main supernaturals are vampires, witches, and werewolves. There are dragons.	Main supernaturals are vampires, witches, werewolves and dragons.
t.	Heroine's friends are supernaturals, and two teachers. Harry Potter is mentioned in the scene where heroine learns her friends are supernaturals.	Heroine's friends are all supernaturals and her teachers. JK Rowling (Harry Potter) is mentioned in the scene where heroine learns her friends are supernaturals.
u.	Heroine meets romantic lead, instant attraction, irritation, and he grins at her "as if he knows exactly what effect he has on" her.	Heroine meets romantic lead, instant attraction, irritation, and he grins at her "as if he knows exactly what kind of effect he's having on" her.
v.	Heroine feels irritated and conflicted by her attraction to him. Heroine describes him with similar words in both books, even down to the clothes he is wearing: black jeans and a t-shirt.	Heroine feels irritated and conflicted by her attraction to him. Heroine describes him with similar words in both books, even down to the clothes he is wearing: black jeans and a t-shirt.

w.	Romantic lead(s) have mind control powers.	Romantic lead(s) have mind control powers.
x.	Romantic lead's type of supernatural being is due to a gene. Heroine wonders if his type is due to a genetic mutation.	Romantic lead's type of supernatural being is due to a genetic mutation.
y.	Heroine obsesses over romantic lead.	Heroine obsesses over romantic lead.
z.	Heroine is nervous around him, babbles.	Heroine is nervous around him, babbles.
aa.	Heroine is drawn to him and finds the danger of him to be exciting.	Heroine is drawn to him and finds the danger of him to be exciting.
bb.	Romantic lead blows hot and cold with her and tries to stay away; he thinks he's a danger to her but he's "selfish" and can't stay away.	Romantic lead blows hot and cold with her and tries to stay away, he thinks he's a "danger" to her but he's "selfish" and can't stay away.
cc.	Heroine and romantic lead (Ash) are connected by loss; Ash has	Heroine and romantic lead (Jaxon) are connected by loss; Jaxon

	lost his older brother who was murdered.	believes he murdered his older brother.
dd.	Romantic lead, his family, and their clan live in a chateau (French for castle).	The boarding school where the students live is a castle.
ee.	Heroine steps through a doorway in the Alaskan winter, and it's summer.	Heroine steps through a doorway in the Alaskan winter and it's summer.
ff.	Aurora Borealis / Northern Lights is part of the story between the heroine and romantic lead.	Aurora Borealis / Northern Lights is part of the story between the heroine and romantic lead.
gg.	Heroine wonders if romantic lead is an alien or monster.	Heroine wonders if romantic lead is an alien or monster.
hh.	First Kiss. Heroine learns about supernatural world and that romantic lead is a werewolf after the triggering event of their first kiss together. He loses self-control during the kiss. His eyes	First Kiss. Heroine learns about supernatural world and that romantic lead is a vampire after the triggering event of their first kiss together. He loses self-control during the kiss. He causes an earthquake by accident

	<p>glow and he starts to shift by accident with his powers.</p> <p>Heroine is scared and wants to run away but can't. She knows his eyes were inhuman and wants to know the truth. The next day she demands answers and wonders if he's an alien, a werewolf, or a vampire.</p>	<p>with his powers. Heroine is scared of the quake and romantic lead because he is "monstrous" and runs. She is hurt and finds puncture marks on her neck. The next day she demands answers and wonders if he's an alien or a vampire.</p>
ii.	<p>Romantic lead is a werewolf and believes heroine is his mate and they are "bonded" together, "mates."</p>	<p>Romantic lead is a vampire and believes the heroine is his mate and they have a "mating bond."</p>
jj.	<p>Heroine feels they have a soul connection, and their thoughts echo one another.</p>	<p>Heroine feels they have a soul connection, and their thoughts echo one another.</p>
kk.	<p>Romantic lead's scent of citrus and waterfalls is alluring to the heroine, and she notices it often.</p>	<p>Romantic lead's scent of oranges and freshwater is alluring to the heroine, and she notices it often.</p>
ll.	<p>Heroine feels selfish about romantic lead.</p>	<p>Heroine feels selfish about romantic lead.</p>

1	mm.	Heroine feels like she's being watched frequently in the story.	Heroine feels like she's being watched frequently in the story.
2			
3	nn.	Heroine is attacked by two vampires who aren't dressed for the winter weather. They remind her of eighties rockers. She starts to fight back in the same way in both books. The romantic lead saves her.	Heroine is attacked by two werewolves who aren't dressed for the winter weather. They remind her of eighties concert goers. She starts to fight back in the same way in both books. The romantic lead saves her.
4			
5			
6			
7			
8			
9			
10			
11			
12			
13	oo.	Heroine hears a voice in her head that warns her and tries to help her. She doesn't understand who or what the voice is. There are actually two distinct beings. One is her long-lost father, now an immortal "abomination;" the other is Ronan (Hudson)	Heroine hears a voice in her head that warns her and tries to help her. She doesn't understand who or what the voice is. There are actually two distinct beings. One is her long-lost grandfather, the Unkillable Beast; the other voice is Hudson (Ronan)
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24	pp.	Heroine is hurt and romantic lead helps her by carrying her in his arms, removing her boots and	Heroine is hurt and romantic lead helps her by carrying her in his arms, removing her boots and setting her on her bed, tending to her.
25			
26			
27			
28			



	setting her on a divan, tending to her.	
qq.	A supernatural war is brewing.	A supernatural war is brewing.
rr.	Heroine is kidnapped by the vampire prince who wants to make her into a vampire believing she will be the reincarnation of his dead mate.	Heroine is kidnapped by the vampire prince's mate who wants to use her for a spell to resurrect her dead mate.
ss.	Heroine stabs a demon to save romantic lead's life; there is a primal war cry in this scene.	Heroine stabs the vampire prince's mate to save romantic lead's life; there is a primal war cry in this scene.
tt.	Heroine offers herself to save her friends' lives, and romantic lead's life.	Heroine offers herself to save the romantic lead's life.
uu.	Romantic lead rescues heroine by breaking down the door.	Romantic lead rescues the heroine by destroying door and wall.
vv.	Romantic lead blames himself for the heroine's abduction by the vampire prince.	Romantic lead blames himself for the heroine's abduction by the vampire prince's mate.

ww.	Heroine worries that romantic lead and Ronan are going to come to mortal blows.	Heroine worries that romantic lead and Hudson are going to come to mortal blows.
xx.	Heroine doesn't want romantic lead to get hurt.	Heroine doesn't want romantic lead to get hurt.
yy.	Heroine realizes she has accidentally released Ronan into the world and has put the world at risk.	Heroine has accidentally released Hudson (into her mind) and has put the world at risk.
zz.	Romantic lead and heroine declare their love toward the end of the story. He tells her he loves her for the first time and so does she.	Romantic lead and heroine declare their love toward the end of the story. He tells her he loves her for the first time and so does she.
aaa.	He feels what has happened is his fault and they have a discussion about whether they should have a relationship.	He feels what has happened is his fault and they have a discussion about whether they should have a relationship.
bbb.	They agree to be together.	They agree to be together.
ccc.	They share an epic kiss.	They share an epic kiss.

1	ddd.	The heroine attempts to sacrifice	The heroine attempts to sacrifice her
2		her life for his.	life for his.
3	eee.	The story ends with the	The book ends with the realization
4		realization that Ronan is free and	that Hudson is free and is tied to the
5		is tied to the heroine.	heroine.
6		See second ending and the	
7		corresponding part in BMR in	
8		Exhibit 1 attached hereto.	
9			
10			
11			

29. Attached hereto as Exhibit “1” is a true and correct copy of a document entitled “KEY: Crave and Blue Moon Rising (BMR) Comparison” (hereinafter the “Key”). The document goes through *Crave* sequentially by page number and compares the content of those pages with the corresponding content in the pages of various versions of the BMR manuscripts. At the end of the description of the corresponding content for BMR, there is a number sign (#) and a number highlighted in green (e.g. #161). The number refers to a paragraph in a document entitled “Index 1: Comparative Quotes, Crave & Blue Moon Rising (BMR)” (hereinafter “Index 1”), which contains the quotes for both *Crave* and *BMR* that evidence the similarities in the content being compared in the corresponding section of the Key. A true and correct copy of Index 1 is attached hereto as Exhibit “2.”

30. There are also many scenes that are substantially similar between the Freeman Copyrighted Material and *Crave*, including:

1 A. Scenes in which heroine is assaulted by two supernaturals, who look  
2 like eighties rockers, outside in the cold Alaskan winter. This scene exists in all  
3 versions of Freeman's manuscripts. Wolff cherry-picks the scene from  
4 Freeman's 2011, 2013, and 2014 versions of the manuscript as follows:

5 1. Two guys wearing jeans and shirts, no coats - not dressed for  
6 the winter weather:

7 a. BMR: "Despite the biting wind, the two men were  
8 dressed in jeans and shirts, no coats, no gloves." 2011 P.  
9 519

10 b. Crave: "...both doors fly open. And in walk two guys  
11 wearing nothing but old-school concert T-shirts, jeans and  
12 lace-up boots. No jackets, no sweaters, no hoodies even." P.  
13 53

14 2. They aren't dressed for the weather and should have been cold:

15 a. BMR: "...they were completely unaffected by the cold.  
16 They should have been shivering, stamping their feet, and  
17 rubbing their hands together." 2011 P. 519

18 b. Crave: "I'm beginning to think they were high or  
19 something, because there's no other explanation as to why  
20 they would have been outside in only jeans and t-shirts. I  
21 mean, how did they avoid getting hypothermia?" P. 68

22 3. Eighties, dog collar, earring/ nose ring // Billy Idol // eighties  
23 rock concert

24 a. BMR: "...a dog collar and an earring...He looks like a  
25 retro throw back to the eighties. In fact, he looks a lot like  
26 Billy Idol." 2013 P. 58 "He looks like a punk rocker  
27 throwback in a bad eighties movie." 2014 P. 48  
28

b. Crave: “And in walk two guys wearing nothing but old-school concert T-shirts...Ones who died at an eighties rock concert...black nose ring right through his septum.” P. 53

4. “Well, well, well. Looks like”

a. BMR: One of the guys says: “Well, well, well. Looks like I’ve hit the jackpot.” 2013 P. 58; 2014 P. 48

b. Crave: One of the guys says: “Well, well, well. Looks like we made it back just in time.” P. 53

5. “My back to his front”

a. BMR: “The Hulk twists my wrists behind my back, pinning me to him, my back to his front.” 2014 P. 49

b. Crave: “He yanks me hard against him--my back to his front...” P. 56

6. She stomps on his toes / thinks about stomping on his feet

a. BMR: “I raise my knees and slam my feet down, heels first onto the Hulk’s toes.” 2013 P. 60; 2014 P. 49

b. Crave: “I think about stomping on his feet, but my Converse aren’t going to do much damage...” P. 56

7. She struggles, bucks, head butts / head back to break his nose

a. BMR: “I struggle against him, lashing out blindly with my feet...I buck backwards for all I’m worth, head butting him. Crack! I’ve hit his nose.” 2014 P. 50

b. Crave: “I start to struggle in earnest...” P. 56 “...I shout, bucking and kicking against him as hard as I can...I slam my head back with as much force as I can, aiming to break his nose.” P. 57

8. Taste of blood in my mouth

1 a. BMR: “And that’s when my head is yanked backward so  
2 hard I bite my tongue. The coppery tang of blood fills my  
3 mouth.” 2014 P. 50

4 b. Crave: “He yelps and jerks, and his forearm slams  
5 against my mouth. It hurts, has the metallic taste of blood  
6 pooling in my mouth.” P. 56-57

7 9. The romantic lead comes to her rescue and scares the two guys  
8 but she doesn’t realize it at first

9 a. BMR: “A roaring growl splits the air around us—a  
10 grizzly bear?—and we’re both hauled backward out of the  
11 van. I roll out of the Hulk’s grasp. Roman (Ash) is on top of  
12 him in a flash, using the Hulk’s face as a punching bag, his  
13 fists are flying so fast. How did Roman (Ash) get to the  
14 van?” 2014 P. 50

15 b. Crave: “...just in time to see Marc go flying across the  
16 entryway as he slams into the farthest wall.” P. 57 “It’s as  
17 he’s pulling me toward him that I get my first good look at  
18 his face and realize that it’s Jaxon.” P. 58

19 10. He looks her over

20 a. BMR: “He looks me over, cupping my face in his hands.”  
21 2014 P. 51

22 b. Crave: For long seconds, he doesn’t say anything, just  
23 looks me over from head to toe...” P. 60

24 11. A secret is mentioned in this scene

25 a. BMR: “The secret’s safe with me, but I think you should  
26 tell her anyway.” 2014 P. 57

27 b. Crave: “I hold his gaze, telling him with a look that I’ll  
28 keep his secret.” P. 59

12. Heroine thanks romantic lead for helping her

a. BMR: “Thanks for—well, for everything.” 2014 P. 57

b. Crave: “Thank you,” I blurt out. “For helping me, I mean.” P. 61

13. He lets her know he doesn’t feel he deserves her thanks

a. BMR: Her: ‘You saved me.’

Her: “He just shakes his head, and I can tell he thinks it’s his fault.” 2014 P. 57 and You don’t know how many times I’ve wondered if those guys at the Stop-N-Go would’ve attacked if you hadn’t been with me. 2014 P. 99

b. Crave: Him: ‘Is that what you think I did?’

Her: ‘Isn’t it?’

Him: “He shakes his head, gives a little laugh that has my heart stuttering in my chest. You have no idea...I just made you a pawn in a game you can’t begin to understand.” P. 61

14. After he leaves, she is left wondering

a. BMR: “He hopped on his bike and took off quickly, not saying another word, leaving me staring after him.

Wondering.” 2011 P. 63; 2014 P. 58 “Already she feels that he is somehow important to her and wonders why.” 5-14-10 Chapter Analysis, Ch 4

b. Crave: “I break off when I realize that I’m talking to myself. Because again, Jaxon is gone. And I’m left wondering when I’ll see him again. And why it matters so much that I do. P. 64

B. First kiss scene which is the triggering event for heroine to learn about the supernatural world.

1. It’s cold but the romantic lead makes her feel heat

1 a. BMR: “Don’t worry, I’ll keep you warm,” he offers. The  
2 way he says it I feel a flutter of heat curl through me.” 2013  
3 P. 155

4 b. Crave: “...try to pretend that despite the chill, his hand on  
5 my arm doesn’t flood every cell of my body with heat.” P.  
6 261

7 2. Just a light show

8 a. BMR: “...that flash across the sky in Alaska in the deep  
9 winter. Just a perfect black background to showcase our  
10 own personal lightshow.” 2013 P. 154

11 b. Crave: “...just watching the most brilliant show I’ve ever  
12 seen light up the sky.” P. 263

13 3. Heroine feels shy

14 a. BMR: “I feel shy and uncertain of myself.” 2013 P. 157

15 b. Crave: “I glance at him, suddenly shy, though I don’t  
16 know why.” P. 263

17 4. She wants him to kiss her but is afraid he might

18 a. BMR: “I want him to kiss me but at the same time I’m  
19 afraid he might. 2013 P. 155

20 b. Crave: “A part of me that wonders what it would feel like  
21 to kiss him and a part of me that thinks I should run for the  
22 hills...” P. 267

23 5. Romantic lead looks at her with yearning / craving

24 a. BMR: “What I see in his face is a mix of wistful yearning  
25 and hope. He’s looking at me like I’m the one who might  
26 be slightly out of reach....” 2013 P. 157; “While I craved  
27 the comfort of his presence, I knew he needed to be here  
28 more than I needed him.” 2010 P. 407



b. Crave: “There’s a desire in his eyes, a craving that has nothing to do with wanting me and everything to do with needing me.” P. 269

6. First kiss is soft, not passionate.

a. BMR: “He leaned in and turned my chin up, pressing his lips ever so gently, ever so softly over my own in a whisper of a first kiss.” 2011 P. 172 “He leaned in and captured my lips with his own. Feather light, feather soft was his kiss, a gentle brush of his lips, the warmth of his breath mingling with my own.” 2011 P. 255

b. Crave: “Then he leans down and presses his lips to mine. It’s not a passionate kiss, not a hard kiss, definitely not a wild kiss. It’s just the brush of one mouth against another, as soft as a snowflake, as delicate as the permafrost...” P. 270

7. Heroine is scared of romantic lead after first kiss: gleaming / burning eyes, inhuman / monstrous/ get out now

a. BMR: “Gleaming amber eyes rimmed in black....

Inhuman eyes...My heart was racing double-time so fast and so hard I was dizzy...It was all I could do not to stomp on his toes and make a run for it...I needed to get out of here. Now.” 2011 P. 173-175.

b. Crave: ‘You. Need. To. Go!’... He advances on me then, fingers flexing and eyes burning like black coals in a face livid with rage. I turn and run as fast as my weak knees will carry me...before this monstrous version of Jaxon overtakes me. P. 272

C. Scene after the first kiss in which heroine learns about the supernatural world.

1. Heroine realizes romantic lead tried to keep his distance so she wouldn't figure out the truth

a. BMR: "The reason he'd kept his distance is because his parents knew he had a shifty eye problem and didn't want him dating a girl from school who might find out about it. Me." 2011 P. 186

b. Crave: "Or is there something more to the story, something that accounts for why my uncle was so nervous and Jaxon so determined to put distance between us." P. 300

2. Heroine doesn't understand what she saw / marks on her neck

a. BMR: "Were they worried he'd bite me? Eat me? Or just scare me?" 2011 P. 186 "I tilted my head to the side and angled the mirror—and felt my face drain of all color. There were markings on the back of my neck!" 2011 P. 190

b. Crave: "And it's these thoughts that have me peeling back the bandage...staring at the cut on my neck. Or, more precisely, at the two perfectly round, perfectly spaced puncture marks..." P. 300

3. Heroine can't sleep after that

a. BMR: "Exhausted, I was too wired to go to sleep ..." 2011 P. 189

b. Crave: "Needless to say, there's no going to sleep after that." P. 301

4. Heroine wants answers

a. BMR: “I wanted answers about Ash and I wanted them now.” 2011 P. 192 (about romantic lead’s eyes and what happened)

b. Crave: “Jaxon, on the other hand...If he lies to me, you’d better believe I’m going to stake him through his fangy black heart...I march through the school like a woman on a mission.” P. 303 (about the fang marks and romantic lead’s part in that).

5. Heroine’s head is spinning when she learns of the supernatural world

a. BMR: “My head was spinning with a hundred different thoughts at one time...” 2011 P. 230

b. Crave: “...it’s just that my head is spinning. This has to be a nightmare.” P. 309

31. Importantly, the characters in *Crave* are remarkably similar to the characters in Freeman’s BMR, including but not limited to:

Characters in *Blue Moon Rising*

Characters in *Crave Series*

**A. The Heroine:**

**Anna (BMR)**

**Grace (*Crave*)**

a. Teen heroine almost 17.

Teen heroine 17.

b. From San Diego.

From San Diego.

c. Moves to Alaska after a tragic accident kills her dad and mom.

Moves to Alaska after a tragic accident kills her dad and grandparents.

d. Suffering a strong sense of loss.

Suffering a strong sense of loss.

e. Has panic attacks and anxiety.

Has panic attacks and anxiety.

f. Uses breathwork to cope.

Uses breathwork to cope.

g. Discovers her family was murdered by the vampire prince.

Discovers her family was murdered by the vampire prince’s mate.

- |  |  |
|--|--|
| <p>h. Her parents kept the supernatural world secret from her.</p> <p>i. Her father was wolf shifter but she didn't know.</p> <p>j. Her parents were "deeply in love with one another."</p> <p>k. She believes she has no family other than her mom and aunt.</p> <p>l. Later, discovers she has a long-lost grandmother.</p> <p>m. She thinks she's human but she's unique among supernaturals.</p> <p>n. Her supernatural purpose is to restore the balance. She is a protector.</p> <p>o. She is the only one of her kind and must bring balance between the races to stop war.</p> <p>p. She hears two voices in her head.</p> <p>q. One is an immortal "abomination" who is trapped in chains in a place reachable by portal. The vampire prince Julian put him there.</p> <p>r. She visits him by portal, tells him she's a friend, and promises to come back for him.</p> <p>s. Later, she learns he is her long-lost father.</p> | <p>Her parents kept the supernatural world secret from her.</p> <p>Her father was a witch but she didn't know.</p> <p>Her parents "loved each other a ridiculous amount."</p> <p>She has believes she has no family other than her cousin and uncle.</p> <p>Later, discovers she has a long-lost grandmother.</p> <p>She thinks she's human but she's unique among supernaturals.</p> <p>Her supernatural purpose is to restore the balance. She is a protector.</p> <p>She is the only one of her kind and must bring balance between the races to stop war;</p> <p>She hears two voices in her head.</p> <p>One is the Unkillable Beast who who is trapped in chains in a place reachable by portal. The vampire king Cyrus put him there.</p> <p>She visits him by portal, tells him she's a friend, and promises to come back for him.</p> <p>Later, she learns he is her long-lost grandfather.</p> |
|--|--|

- |  |   |
|--|---|
| <p>1 t. The other voice she hears in her</p> <p>2 head is Ronan (Hudson).</p> <p>3 u. She is immune to certain magic.</p> <p>4 v. When she learns she is supernatural</p> <p>5 thinks she is half human.</p> <p>6 w. She is a Nyx.</p> <p>7 x. She thinks her mother is human.</p> <p>8 y. Her mother is a Kindred witch,</p> <p>9 and she comes from a long line</p> <p>10 z. She is born of mixed bloodlines.</p> <p>11 aa. She is the descendant of a twin goddess;</p> <p>12 bb. She is a semi-god.</p> <p>13 cc. Kindred witches are made of magic.</p> <p>14</p> <p>15 dd. Kindred were wiped out to near</p> <p>16 extinction because of a betrayal.</p> <p>17 ee. She has magical tattoos, that itch/burn.</p> <p>18 ff. High school junior, takes honors classes.</p> <p>19 gg. Loves books / reading.</p> <p>20 hh. Thinks she isn't beautiful.</p> <p>21 ii. Saves romantic lead's life.</p> <p>22 jj. Sacrifices herself for the romantic</p> <p>23 lead's life.</p> <p>24 kk. Drinks a lot of tea, tea is a thing in her</p> <p>25 family.</p> <p>26 ll. Aunt makes special herbal tea blends.</p> <p>27 mm. The tea was used to bind her magic</p> <p>28 and keep her ignorant of her powers</p> | <p>The other voice she hears in her head is Hudson (Ronan).</p> <p>She is immune to certain magic.</p> <p>When she learns she is supernatural</p> <p>thinks she is half human.</p> <p>She is a gargoyle.</p> <p>She thinks her mother was human.</p> <p>Her mother was a gargoyle, and she</p> <p>she comes from a long line of gargoyles.</p> <p>She is born of mixed bloodlines.</p> <p>She is the descendant of a twin goddess;</p> <p>she is a demi-god.</p> <p>Gargoyles were created by witches and are born of magic.</p> <p>Gargoyles were wiped out to near extinction because of a betrayal.</p> <p>She has magical tattoos, that itch/ burn.</p> <p>High school senior, takes AP classes.</p> <p>Loves books / reading.</p> <p>Thinks she isn't beautiful.</p> <p>Saves romantic lead's life.</p> <p>Sacrifices herself for the romantic lead's life.</p> <p>Drinks a lot of tea, tea is a thing in her family.</p> <p>Mom made special herbal tea blends.</p> <p>The tea was used to bind her magic and keep her ignorant of her powers and the</p> |
|--|---|

- |   |   |                                       |
|---|---|---------------------------------------|
| 1 | and the supernatural world.               | supernatural world.                   |
| 2 | nn. Loves Mexican food                    | Loves Mexican food                    |
| 3 | oo. Supernatural beings in the story call | Supernatural beings in the story call |
| 4 | her “child,” “little girl,” “cherie”      | her “child,” “little girl,” “cher”    |
| 5 | “daughter.”                               | “daughter.”                           |
| 6 | pp. She is a queen.                       | She is a queen.                       |

7

## 8 **B. The Romantic Lead**

### 9 **Ash (BMR)**

- 10 a. Werewolf shifter.
- 11 b. Becomes heroine’s boyfriend.
- 12 c. Citrus and waterfall scent, spicy.
- 13 d. Scent is part of his allure to heroine
- 14 and is mentioned frequently.
- 15 e. Intense, cocky, dangerous edge.
- 16 f. Unusual “amber” eyes rimmed in
- 17 black that are riveting.
- 18 g. Dark hair.
- 19 h. Tall, slim, muscled.
- 20 i. Full red lips.
- 21 j. Wears black jeans and t-shirt the
- 22 day he meets the heroine.
- 23 k. Wears designer clothing.
- 24 l. Wears a black v-neck sweater.
- 25 m. Wants heroine to stay away but can’t
- 26 resist her.
- 27 n. Fiercely protective of heroine.
- 28 o. Blames himself for her being in danger.

### **Jaxon (*Crave*)**

- Vampire.
- Becomes heroine’s boyfriend.
- Orange and fresh water scent, spice.
- Scent is part of his allure to heroine
- and is mentioned frequently.
- Intense, cocky, dangerous edge.
- Unusual “obsidian” eyes that are
- riveting.
- Dark hair.
- Tall, slim, muscled
- Full red lips.
- Wears black jeans and t-shirt the day
- day he meets the heroine.
- Wears designer clothing.
- Wears a black v-neck sweater.
- Wants heroine to stay away but can’t
- resist her.
- Fiercely protective of heroine.
- Blames himself for her being in danger.

- p. His older brother was murdered and he feels responsible.
- q. Crooked grin.
- r. Rescues heroine from vampire prince's mate
- s. Gets jealous of Brendan (Crave's Flint) when he is around the heroine. Doesn't know Brendan is gay.
- t. Has powers with his mind, can compel, calm, and persuade others.
- u. Seems like he can fly--can jump really high.
- v. Has a magical ability to "cast" - move so quickly looks like he's appearing and disappearing.
- W. He is described by heroine as:  
Dangerous, dark angel, bad boy, sexy, arrogant rock star, gorgeous, beautiful, wicked, wild, hot, smoking hot...
- x. He tells heroine their relationship isn't going to be easy.
- y. Doesn't want heroine to walk away because he wants to experience what is between them.
- z. Tells her he loves her for the first time at the end of the first book.

### **C. The Vampire trapped in another dimension**

1	<b>Ronan (aka The Bloodletter) (<i>BMR</i>)</b>	<b>Hudson (<i>Crave</i>)</b>
2	a. Royal	Royal prince
3	b. Powerful magical gifts	Powerful magical gifts
4	c. Vampire, Druid, magus, and shifter	Vampire
5	d. Dark hair, “stormy blue eyes.”	Dark hair, “stormy blue eyes.”
6	e. Believed to be evil.	Believed to be evil.
7	f. Said to have been depraved, not sane	Said to have been depraved, not sane
8	g. Said to have taken away free will from	Said to have taken away free will from
9	others.	others.
10	h. An apocalypse could occur if he’s free.	An apocalypse could occur if he’s free.
11	i. Has been trapped in his wolf form in	Has been trapped in spirit form in
12	another dimension.	another dimension.
13	j. Accent “neither British nor Scottish.”	British accent.
14	k. Mocking smile, chiseled features,	Mocking smile, chiseled features,
15	gorgeous.	gorgeous.
16	l. Tall, slim, and muscled.	Tall, slim, and muscled.
17	m. Heroine doesn’t remember him	Heroine doesn’t remember him
18	though they’ve met and spent time	though they’ve met and spent time
19	together in another dimension.	together in another dimension.
20	n. Heroine accidentally releases him from	Heroine accidentally releases him from
21	the other dimension.	the other dimension.
22	o. It is believed he will bring war.	It is believed he will bring war.
23	p. Caused the “wholesale slaughter of his	Caused “genocide.”
24	people.”	
25	q. He in fact isn’t evil; he acted for the	He isn’t evil; he acted for the greater
26	greater good.	good.
27	r. He’s not what he seems and has	He’s not what he seems and has
28	extraordinary power.	extraordinary power.



<p>s Bites heroine's lip to taste her blood.</p> <p>t. In registered 2010 notes he was in love triangle and romantic lead for book two.</p> <p>u. Helps heroine use her powers rather than protect her.</p> <p>v. Calls the heroine "love."</p> <p>w. He believes he is hers and she is his.</p> <p>x. Heroine chooses him over romantic lead.</p>	<p>Bites heroine's lip to taste her blood.</p> <p>In love triangle with heroine and and romantic lead.</p> <p>Helps heroine use her powers rather than protect her.</p> <p>Calls the heroine "love."</p> <p>He is her mate.</p> <p>Heroine chooses him over romantic lead.</p>
--	--

#### **D. The Heronine's long lost grandmother**

##### **The High Priestess (*BMR*)**

a. Born a witch, made a vampire

b. Heroine's long-lost grandmother she never knew she had.

c. Is powerful and has powerful magic.

d. She is consulted for advice by heroine.

e. Offers advice but it's advice that forces heroine to make her own decisions.

f. Tells heroine she'll "know what to do."

g. Has "more than a hint of danger in her green eyes."

h. Calls heroine "child" and "darling."

i. Talks to heroine about sacrifice.

j. Tells heroine magical gifts come with a price.

##### **The Bloodletter (*Crave*)**

Vampire but can work magic

Heroine's long-lost grandmother she never knew she had.

Is powerful and has powerful magic.

She is consulted for advice by romantic lead and heroine.

Offers advice but it's advice that that forces heroine and romantic lead to make their own decisions.

Tells heroine she'll "know what to do."

Has "more than a hint of avarice in her green eyes."

Calls heroine "child" and "darling."

Talks to heroine about sacrifice.

Tells heroine all magic has a price.

- |   |  |
|---|--|
| <p>1 k. Lives in another dimension.</p> <p>2 l. It's high Summer where heroine visits</p> <p>3 her even though it's winter in Alaska.</p> <p>4</p> <p>5</p> <p>6 <b>E. The Heronine's close male friend</b></p> <p>7 <b>Brendan (<i>BMR</i>)</b></p> <p>8 a. His parents are a mixed race couple.</p> <p>9 b. He has warm café-au-lait skin,</p> <p>10 mochachino skin.</p> <p>11 c. He's multiracial; part black.</p> <p>12 d. He's gay.</p> <p>13 e. Only the heroine knows he's gay.</p> <p>14</p> <p>15 f. He's gorgeous, good-looking.</p> <p>16 g. He's brainy.</p> <p>17 h. He's athletic / on school sports team.</p> <p>18 i. He calls the heroine nicknames and</p> <p>19 teases her.</p> <p>20 j. He "waggles his brows" at the heroine</p> <p>21 in humor.</p> <p>22 k. Romantic lead is jealous of him being</p> <p>23 with the heroine.</p> <p>24 l. He's a faery; Fae.</p> <p>25 m. Heroine thinks he's beautiful in his</p> <p>26 supernatural form.</p> <p>27 n. He flashes heroine a big smile, and</p> <p>28 has a smile he's known for.</p> | <p>Lives in a cave deep below the ice.</p> <p>Takes heroine to a room where it's high</p> <p>Summer even though it's winter in</p> <p>Alaska.</p> <p><b>Flint (<i>Crave</i>)</b></p> <p>His parents are a mixed race couple.</p> <p>He has warm brown skin.</p> <p>He's multiracial; part black.</p> <p>He's gay.</p> <p>Only the heroine knows he's gay</p> <p>(at first).</p> <p>He's gorgeous, good-looking.</p> <p>He's super smart.</p> <p>He's athletic / on school sports team.</p> <p>He calls the heroine New Girl through</p> <p>all the books and teases her.</p> <p>He "waggles his brows" at the heroine</p> <p>in humor.</p> <p>Romantic lead is jealous of him being</p> <p>with the heroine.</p> <p>He's a dragon shifter.</p> <p>Heroine thinks he's beautiful in his</p> <p>supernatural form.</p> <p>He flashes heroine a big smile, and has a</p> <p>smile he's known for.</p> |
|---|--|

1 o. He, heroine, and their friends, are on He, heroine, and their friends, are on  
2 the school paper together. the school Ludares team together.

3 17. He is a leader: school president. He's a leader: captain of the Ludares  
4 team.

5 **F. The Vampire pushing war**

6 **Julian (*BMR*)**

**Cyrus (*Crave*)**

7 a. Vampire Prince (there is no king).

Vampire King.

8 b. Belongs to a royal court.

Belongs to a royal court.

9 c. Leader of the Order, demon faction.

Leader of the council / circle.

10 d. He's an elitist.

He's a born vampire supremacist.

11 e. He's described as "like a king cobra."

He's described as "like a cobra."

12 f. He's evil.

He's evil.

13 g. Has a special bite, the Kiss of Death  
14 / Life which can be lethal.

Has a special bite, the Eternal Bite  
which is lethal.

15 h. Wants war so supernaturals can take  
16 over the earth.

Wants war so supernaturals can take  
over the earth.

17 i. Ronan is thought to be in league with  
18 him; it's believed he would join  
19 Julian to bring the next supernatural war.

Hudson is thought to be in league with  
him; it's believed he would join Cyrus  
to bring the next supernatural war.

20 j. Calls the heroine "little girl."

Calls the heroine "little girl."

21 k. Wants to give heroine his special bite  
22 (the Kiss of Life/Death), which could  
23 kill her.

Gives heroine his special bite, the  
Eternal bite, which should kill her.

24 l. He has a daughter from another woman  
25 who is not his mate, which is a surprise  
26 in the story.

He has a daughter from another woman  
who is not his mate, which is a surprise  
in the story.

27 m. His daughter is related to the heroine:  
28 she is her half-sister.

His daughter is related to the heroine:  
she is her cousin and the romantic

- 1 lead's half-sister.
- 2 n. His daughter helps him when he holds His daughter helps him when he holds
- 3 the heroine and her friends prisoner. The heroine and her friends prisoner.
- 4 o. He is tall with blue eyes that are an He is tall with blue eyes that are cobalt
- 5 intense shade of blue. blue.
- 6 p. He and the heroine make a deal when he He and heroine make a deal when he
- 7 has her. She wants to save her friends. has her. She wants to save her friends.
- 8 q. The heroine fights him, even believing The heroine fights him, even believing
- 9 that she won't win. that she won't win.

## 11 **G. Her long-lost father / grandfather**

### 12 **Dante (*BMR*)**

- 13 a. Called the immortal Abomination.
- 14 b. Speaks Gaelic.
- 15 c. Turns out to be heroine's father.
- 16 d. One of two voices the heroine hears
- 17 in her head.
- 18 e. Gives her warnings, tells her things.
- 19 f. He is a werewolf shifter.
- 20 g. He communicates with other of his
- 21 kind telepathically.
- 22 h. Heroine is half of his kind of
- 23 supernatural by blood.
- 24 i. Trapped by vampire prince Julian,
- 25 he is in a steel trap chained to a tree
- 26 which is accessible by portal.
- 27 j. Heroine visits / tries to free him.
- 28 k. She tells him she's a friend an

### **Allistair (*Crave*)**

- Called the Unkillable Beast.
- Speaks Gaelic.
- Turns out to be heroine's grandfather.
- One of two voices the heroine hears
- in her head.
- Gives her warnings, tells her things.
- He is a gargoyle.
- He communicates with others of his
- kind telepathically.
- Heroine is half of his kind of
- supernatural by blood.
- Trapped by vampire king Cyrus,
- he is in chains on a wall in a cave
- which is accessible by portal.
- Heroine visits / tries to free him.
- She tells him she's a friend and

promises to come back for him.

promises to come back for him.

## H. The Witch Aunt / Uncle

### Aunt Brie (*BMR*)

### Uncle Finn (*Crave*)

a. Heroine's aunt.

Heroine's uncle.

b. Witch.

Witch (warlock).

c. Warm and kind to heroine.

Warm and kind to heroine.

d. Tells her about the supernatural world.

Tells her about the supernatural world.

e. Heroine's only other known relative  
at the beginning of the story other  
than her mom.

Heroine's only other known relative  
at the beginning of the story other than  
her cousin.

f. Talks to the heroine about the romantic  
lead and his appeal, embarrassing her.

Talks to the heroine about the romantic  
lead and his appeal, embarrassing her.

g. Kisses heroine on top of her head  
throughout the story.

Kisses heroine on top of her head  
throughout the series.

h. Talks to heroine about her father's  
necklace, tells her never to take it off.

Talks to heroine about her father's rune  
stone, tells her to keep it on her at all  
times.

32. The substantial similarity between the Freeman Copyrighted Material and the first four books of the *Crave* series are also overwhelming and undeniable. Each book in the *Crave* series is based on the same characters and continues the *Crave* storyline by pulling a new subplot of the Freeman Copyrighted Material for each new book. Additionally, they contain a number of the same scenes that are in the Freeman Copyrighted Material and a staggering number of similar words and phrases, which could not possibly be a coincidence. Set forth below are a handful of examples of remarkably similar words and phrases occurring in similar scenes and contexts between parallel characters:

1  
2 **A. CRAVE (BOOK 1)**

3 1) Heroine reflects that Alaska feels like (living on) the moon

4 **BMR:** "...winter in Alaska must be like living on the moon..." 2011 P. 274

5 **Crave:** "Alaska feels like the moon." P. 34

6  
7 2) Heroine is in "way" over her head

8 **BMR:** "I was in way over my head." 2011 P. 121

9 **Crave:** "...I'm in way over my head..." P. 177

10  
11 3) And I don't believe in coincidences

12 **BMR:** "And I don't believe in coincidences..." 2010 P. 414 (2011 P. 516)

13 **Crave:** "And I don't believe in coincidences." P. 403

14  
15 4) Romantic lead wears black jeans and a t-shirt

16 **BMR:** "...though he was dressed well in black designer jeans and a black t-shirt..."

17 2011 P. 20

18 **Crave:** "...the black jeans and t-shirt he's wearing..." P. 22

19  
20 5) Romantic lead wears a black V-neck sweater

21 **BMR:** "...dressed well in jeans and a black v-neck sweater..." 2010 P. 16

22 **Crave:** "Dressed all in Gucci black--silk V-neck sweater..." P. 86

23  
24 6) Romantic lead brings his thumb to his lips, licks /sucks, gaze with heroine

25 **BMR:** "He brought his thumb to his lips and licked it, his gaze locked with mine."

26 2011 P. 594

27 **Crave:** "Then brings his thumb to his lips and —holding my gaze with his own—his

28 thumb in his mouth and slowly sucks off the blood." P. 62

7) After an embarrassing moment with the romantic lead

**BMR:** "... I wanted the ground to just open up and swallow me." 2011 P. 107

**Crave:** "...I pray for the ground to open up and swallow me." P. 254

8) Heroine drifts in and out of fitful sleep

**BMR:** "As I drift in and out of fitful sleep, I hear...." 2011 P. 203

**Crave:** "I drift in and out of sleep.....and eventually fall into a fitful sleep...." P. 109

9) Mouth opens and closes like a fish out of water, struggle for

**BMR:** "My mouth opens and closes like a fish out of water...I struggle for air, my body thrashing." 2011 P. 2

**Crave:** "Stunned, his mouth opening and closing like a fish out of water as he struggles for a decent response." P. 373

10) Frankenstein

**BMR:** "Apparently, the next time I saw Ash, if I ever saw him again, I could very well be a monster of Julian's creation. Frankenstein's bride" 2012 P. 474

**Crave:** "I read Frankenstein last year—I can only imagine what abomination she'll bring back from the dead if her little plan actually works." P. 485

11) Using every ounce of willpower

**BMR:** "Using every ounce of willpower that remained to me...2011 P. 499

**Crave:** "Then, using every ounce of willpower I have left," P. 479

12) My eyes bug out of my head (heroine)

**BMR:** "My eyes bugged out of my head as I turned to see." 2011 P. 280

1 **Crave:** "...my eyes bugging out of my head. P. 239

2 13) Wait for the other shoe to drop

3 **BMR:** "It was amusing in a 'waiting for the other shoe to drop' sort of way... 2011  
4 P.275

5 **Crave:** "I...wait for the other shoe to drop even though..." P. 340

6 14) Soul sucking demon

7 **BMR:** "I'd been taken. By demons. Soul sucking demons." 2012 P. 440

8 **Crave:** "How was I supposed to know Angie was a soul-sucking demon?" P. 219

9 15) Adding fuel to the fire (gossip reference)

10 **BMR:** "Adding fuel to the fire." 2011 P. 319 (in reference to gossip.)

11 **Crave:** "...last thing I need to do is add fuel to the fire." P. 424 (in reference to gossip)

12 16) Heroine bats her hands away

13 **BMR:** "I'll be fine," I said as I batted her hands away. 2011 P. 14

14 **Crave:** "It's okay; I can do it," I bat her hands away... P. 171

15 17) Romantic lead makes heroine feel like spontaneous combustion

16 **BMR:** "My own spontaneous combustion would be great right about now. He's at the  
17 door in a flash, opening it for me..." 2016 P. 19

18 **Crave:** "...make me feel like I might spontaneously combust--especially if I spend  
19 much longer thinking about Jaxon." P. 170

20 18) Anxiety and panic quotes about heroine's physical symptoms of panic

21 **BMR:** "My stomach tightens." 2016 P. 14



1 **Crave:** “My stomach tightens up...” P. 403

2 **BMR:** “My heart sank down to my stomach and my stomach dropped down to my  
3 feet.” 2011 P. 199

4 **Crave:** “My heart falls straight to my feet...” P. 289

5 **BMR:** “My heart was racing double-time...” 2011 P. 175

6 **Crave:** “...my heart beats triple time.” P. 188

7 **BMR:** “My stomach was already performing the Olympic gymnastics routine.” P. 101

8 **Crave:** “My already nervous stomach does a series of somersaults.” P. 206

9 **BMR:** “My throat felt tight and I spoke slowly to get the words out...” 2011 P. 31

10 **Crave:** “I barely manage to get the words out past my suddenly tight throat.” P. 139

11 19) Everything in her is “screaming” when romantic lead offers her  
12 something

13 **BMR:** Romantic lead offers heroine a ride: “Everything within me is screaming to just  
14 give in and say yes.” 2012 P. 49

15 **Crave:** Romantic lead offers heroine a necklace: “even though everything inside me is  
16 screaming for me to hold tight to the necklace...” P. 443

17 20) Fury, “yearning” to destroy / destruction

18 **BMR:** “A fury so strong I actually felt on fire with it and yearned to destroy him.” 2011  
19 P. 551

1 **Crave:** “**Fury** sweeps through me...He puts his hands on her hips in a gesture that makes  
2 every cell in my body **yearn for destruction.**” P. 553-554

3 21) Aunt Brie / Uncle Finn kisses the top of heroine’s head

4 **BMR:** “She **kisses the top of my head** as she gets up to leave.” 2012 P. 123

5 **Crave:** “...with a **kiss to the top of my head...**” P. 116; “...**kiss on the top of my head.**”  
6 P. 207

7 22) Romantic lead does a mock bow

8 **BMR:** “**He** swept his arm out, ducking in a **mock bow...**” 2011 P. 37

9 **Crave:** “**He** does a **mock** little **bow.**” P. 392

10 23) His warm breath against my ear; his scent wrapped itself around me

11 **BMR:** “... **his warm breath** delicious **against my ear.** **His scent** **wrapped itself around**  
12 **me,**” 2011

13 P. 172-73

14 **Crave:** “...**his breath is so warm** and soft **against my ear...**and the orange and dark  
15 water **scent of him** currently **wrapping itself around me.** P. 141

16 24) Velvet wing chair vs. Velvet wingback chair

17 **BMR:** “I sat on the plush **velvet wing chair** on the.....” 2011 P. 209

18 **Crave:** “...and the huge red **velvet wingback chair** P. 89

19 25) Vampires ... oh my

20 **BMR:** “**Vampires** trolls and demons **oh my.**” 2011 P. 500

21 **Crave:** “**Vampires,** dragons and werewolves **oh my!**” P. 324

26) Harry Potter reference

**BMR:** “Just think of what I’m doing as my very own ‘sorting hat.’” “You’re really quoting Harry Potter...” 2011 P. 533

**Crave:** “I can’t help wondering if this castle--like Hogwarts--comes equipped with its very own ghosts.” P. 53

27) Movies and Tom Cruise

**BMR:** ““And I love all of the ‘Raiders of the Lost Ark’ movies too.” He gave his best bad-boy grin, one that would do Tom Cruise proud.’ 2011 P. 42

**Crave:** “So you’re an old movie buff? Or just an old - Tom Cruise - movie buff?” P. 262

28) Shakespeare reference

**BMR:** “Et tu, brute?” 2011 P. 40 *Julius Caesar*

**Crave:** “Et tu, brute?” P. 164 *Julius Caesar*

29) Things that go bump in the night

**BMR:** “Things that go bump in the night.” 2010 P. 3, 185, 232, 476; The Plot 2008

**Crave:** “Things that go bump in the night.” P. 28, 198, 343

30) Molten amber eyes, bright

**BMR:** “His eyes were molten amber... bright and shiny...” 2011 P. 367

**Crave:** “...those molten amber eyes of his.” P. 362 “Bright-amber eyes.” P. 35

Attached hereto as Exhibit “3” is a true and correct copy of a document entitled “Substantially Similar Language (Primarily Phrases) in Crave and BMR” containing a list of much of the similar language contained in both *Crave* and *BMR*.

## B. CRUSH (BOOK 2)

1) The Ronan / Hudson character says to the heroine:

**BMR:** “This is just the beginning.” 2013 P. 466

**Crush:** “This is just the beginning.” P. 400

2) The Brendan / Flint character waggles his brows at the heroine

**BMR:** “Brendan waggled his brows at me, the brat.” 2011 P. 166

**Crush:** “Flint ...then waggles his brows at me.” P. 272

3) The Jenny / Macy character “practically jumps up and down” with heroine

**BMR:** “She grabs my arm and practically jumps up and down.” 2013 P. 245

**Crush:** “She wraps her arms around me like a limpet and practically jumps up and down...” P. 62-63

4) Heroine promises to free the immortal abomination / Unkillable Beast character

**BMR:** “But I’ll be back for you. I promise.” 2012 P. 513

**Crush:** “But I promise, we’ll come back for you.” P. 547

5) Heroine is told she’ll know what to do by the High Priestess / Bloodletter character

**BMR:** “You will know what to do when the time comes.” 2013 P. 221

1 **Crush:** “The Bloodletter told me I’d know what to do when the time was right.”

2 P.581

3  
4 6) Heroine hears a voice inside her head that screams

5 **BMR:** “The voice inside my head was screaming at me to look down. Look away,  
6 look anywhere but at him.” 2011 P. 499

7 **Crush:** “The voice inside me is screaming now. Go back, go back, go back!” P. 531

8  
9 7) Heroine hears a voice inside her head (immortal abomination /  
10 unkillable beast) that warns her

11 **BMR:** “Vampire!” the voice inside my head shrieked. 2011 P. 520; “Demon! the  
12 voice inside my head screams.” 2014 P. 313

13  
14 **Crush:** “Get up! the voice deep inside me says.” P. 608

15  
16 8) The evil vampire prince / vampire king character is like a cobra

17 **BMR:** “...he walked up to her slowly, like a king cobra moving in for the strike.”  
18 2011 P. 552

19 **Crush:** “Cyrus...who is like a cobra, because it serves everyone best if you don’t  
20 take your eyes off him...” P. 380

21  
22 9) Jeans and a black turtleneck

23 **BMR:** “...she snatched them, a pair of jeans and a sleek black turtle neck...” 2011 P.  
24 481

25 **Crush:** “She’s dressed much more casually...in a pair of jeans and a black  
26 turtleneck...” P. 397

27  
28 10) Heroine is told nice of you to join us

1 **BMR:** “Nice of you to join us,” he says to Anna. 2011 P. 38

2 **Crush:** “Nice of you to join us, Grace,” Cyrus says. P. 589

3 11) Heroine wonders am I dead

4 **BMR:** “Am I dead?” 2011 P. 3

5 **Crush:** “Am I dead?” P. 17-18

6 12) Heroine spinning out of control thinks of driving test / instructor

7 **BMR:** “Do you turn into a spin on the ice or are you supposed to turn away from a  
8 spin? I know that was one of the questions on my driver’s test. I just can’t remember  
9 the answer. I try it both ways but it doesn’t matter. I’m spinning out of control.” 2013  
10 P. 463

11 **Crush:** “She catches me with a huge block of ice to the hip, which sends me spinning  
12 out of control... I plummet downward in a flat-out spin...so in the end I do what my  
13 driving instructor taught me to do when skidding out in a car. Instead of fighting to  
14 pull out of the spin, I turn into it.” P. 617

15 13) Looks like sucked/swallowed a lemon

16 **BMR:** “She looked like she’d sucked a lemon” 2011 P. 335

17 **Crush:** “He looks like he swallowed a lemon” P. 204

18 14) Heroine says sleep claims me

19 **BMR:** “I...wait for sleep to claim me.” 2012 P. 8

20 **Crush:** “But right before sleep claims me...” P. 360

21 15) Three Musketeers, Alexandre Dumas

22 **BMR:** “All for one and one for all...” 2011 P. 518

23 **Crush:** “What’s that old saying? One for all and all for one...” P. 89

24 16) Peter Pan reference

25 **BMR:** Heroine about jumping off a balcony: “Was it Peter Pan and Wendy or  
26 Superman and Lois Lane?” I tried to joke.” 2013 P. 369.  
27  
28

1 **Crush:** Heroine in a conversation about flying: “You’re a gargoyle, not Peter Pan.”  
2 P. 328

3 17) Heroine has mock horror

4 **BMR:** “I look down at my outfit in mock horror.” 2013 P. 137

5 **Crush:** “I tease, shaking my head in mock horror...” P. 104

6 18) Heroine with Ash / Jaxon: My face, his neck, breathe him in

7 **BMR:** “...my face resting against the bare skin of his neck. I breathed him in...” 2011  
8 P. 414

9 **Crush:** “I bury my face in the spot where his shoulder meets his neck, and I breathe  
10 him in.” P. 576

11 19) Heroine: scream rises in my throat

12 **BMR:** “I smother the panicky scream that rises in my throat.” 2012 P. 188

13 **Crush:** “I demand, even as a scream rises in my throat.” P. 280

14 20) Heroine: panic rises into throat and I swallow it

15 **BMR:** “...panic rises up from my stomach into my throat but I swallow it....”  
16 2013 P. 310

17 **Crush:** “I swallow the panic rising in my throat...” P. 483

18 20) Heroine: swallowed. Hard.

19 **BMR:** “I swallowed. Hard.” 2011 P. 422, 457

20 **Crush:** “I swallow. Hard.” P. 84

21 21) Heroine: my heart is in my eyes

22 **BMR:** “My heart is in my eyes.” 2013 P. 224

23 **Crush:** “I look at him with what I know is my heart in my eyes...” P. 478-479

24 22) That old TV show

25 **BMR:** “if we were on that old TV show...” 2011 P. 22

26 **Crush:** “...despite what that old TV show said.” P. 439

27 23) Romantic lead smells like citrus / orange and spice and water

28 **BMR:** Ash smells like “citrus and spice...and waterfalls.” 2011 P. 436

1 **Crush:** Jaxon smells like “oranges and fresh water, and warm spicy cinnamon...” P.  
2 10.

3 24) Woodsy scent

4 **BMR:** “He smelled wonderful, a clean, woodsy scent.” 2011 P. 17

5 **Crush:** “...even as his familiar woodsy scent...” about Uncle Finn. P. 8

6 25) Troll / Giant character is the largest person heroine has ever seen

7 **BMR:** “...the door was opened by one of the largest men I’d ever seen.” 2011 P. 489

8 **Crush:** “I think he’s the largest person I’ve ever seen.” P. 53

9 **BMR:** “... easily almost seven feet of rock solid muscle...” 2011 P. 489

10 **Crush:** “He’s a huge man—seven feet at least...” P. 53

11 26) The Troll / Giant character doesn’t eat humans

12 **BMR:** ““The part about eating humans is propaganda,’ Ash answered...” P. 491

13 **Crush:** “Yes, he’s a giant. But no, he doesn’t eat people.” P. 54

14 27) Spoil sport

15 **BMR:** “Don’t be such a spoil-sport.” 2011 P. 339

16 **Crush:** “Fine, spoilsport.” P. 50

17 28) Heroine realizes she’s not human

18 **BMR:** “I’m not human.” 2011 P. 493

19 **Crush:** “I’m not human.” P. 563

20 44) Two sides of the same coin

21 **BMR:** “You can’t have one without the other because they’re two sides of the  
22 same coin...” 2013 P. 90

23 **Crush:** “It just makes them two sides of the same coin.” P. 221

24  
25 **C. COVET (BOOK 3\_**

26 1) Heroine “locks them in a box;” her fear and anxiety

27 **BMR:** “So I decided to push my feelings of fear and dread all the way down, out of  
28 reach and lock them in a box.” 2011 P. 474



1 **Covet:** “And then I lock them away in a box as quickly as they come...I’d do almost  
2 anything to avoid a panic attack.” P. 66

3 2) Heroine believes she is half-human once she knows she’s a magical  
4 being

5 **BMR:** “Is it because I’m half human...” 2013 P. 344

6 **Covet:** “I may be only eighteen years old--and half human...” P. 431

7 3) Part lion part human

8 **BMR:** “...mythological beings part lion, part human...” 2011 P. 230

9 **Covet:** “Manticores are part human and part lion...” P. 454

10 4) Heroine “wraps my arms around my” when she panics

11  
12 **BMR:** “I wrap my arms around my middle...The room is spinning out of control.”  
13 2012 P. 188

14 **Covet:** “I wrap my arms around my waist, the walls of the room closing in...” P. 113

15 5) Heroine’s mouth feels like cotton

16 **BMR:** “My mouth feels like it’s stuffed with cotton.” 2014 P. 51

17 **Covet:** “And my mouth feels like it’s full of cotton...” P. 103

18 6) Heroine says “I’m not most people”

19 **BMR:** “I guess I’m not most people,” I murmured softly. 2011 P. 409

20 **Covet:** “Yeah, well. I’m not most people.” P. 42

21 7) Heroine says what am I supposed to say to that

22 **BMR:** “I mean what am I supposed to say to that?” 2013 P. 268

23 **Covet:** “I don’t even know what I’m supposed to say to that?” P. 110

24 8) Heroine has word vomit and babble with the romantic lead

25 **BMR:** “Word vomit...I’m possessed by a wracking case of babbling, stumbling  
26 idiocy, with no control over what comes out of my mouth.” 2013 P. 51

27 **Covet:** “The more I babble, the more stonelike Hudson’s face becomes until I force  
28 myself to stop vomiting words and take an actual breath.” P. 52

9) Dante's Inferno reference

**BMR:** "I felt like I was in Dante's "Inferno" ...." 2011 P. 491

**Covet:** "Ever read Dante's "Inferno"? I'm thinking he took inspiration from this place..." P. 471

10) Humpty Dumpty reference

**BMR:** "Humpty Dumpty sat on a wall. Humpty Dumpty had a great fall..." 2011 P. 346

**Covet:** "Humpty Dumpty Got Nothing on Us." P. 414

11) The Incredible Hulk

**BMR:** "The Incredible Hulk already has the door... the Hulk grabs me..." 2013 P. 59

**Covet:** "You're Iron Man and the Hulk all rolled into one." P. 179

12) Superman and Lois Lane

**BMR:** "I'm sure I've seen this in a movie before. Was it Peter Pan and Wendy or Superman and Lois Lane?" I tried to joke." 2013 P. 369

**Covet:** "I feel just like Lois Lane...You know, in the movie, Superman crushes coal to give Lois a diamond." P. 282

13) Romeo and Juliette

**BMR:** "We're star-crossed before the first date. Romeo and Juliette." 2011 P. 284

**Covet:** What it sounds like is some magical, next-gen *Romeo and Juliet* shit." P. 407

14) Sleeping Beauty

**BMR:** "It looked just like the sort of bed Sleeping Beauty might have slept in waiting for her prince to find her and break the spell—the wood carved with curlicues and fanciful swirls." 2011 P. 210

**Covet:** "...cheerful carvings on the staircase and room railings...As I look at this place, I'm reminded of one of the versions of *Sleeping Beauty*...After the girl pricked her finger and fell into a sleep for a hundred years..." P. 242

15) Snow White

1 **BMR:** ““Snow White,’ she whispers.” 2014 P. 102

2 **Covet:** “Or Snow White, for that matter.” P. 665

3 16) Berserkers

4 **BMR:** “Berserkers were legendary warriors who went into a rage and fought...”

5 2011 P. 421

6 **Covet:** “Nuri’s guards come at me like berserkers.” P. 433

7 17) Wendigo / Windigos eat humans

8 **BMR:** “I know from my Native studies class that a wendigo is a mythological shape-  
9 shifting monster that craves human flesh...” 2013 P. 81

10 **Covet:** ““Windigos,’ Hudson replies quietly. ‘You don’t want to mess with them...  
11 They’re vicious and they eat humans...” P. 498

12 18) Zombies

13 **BMR:** “The whole sci-fi movie scenario plays in my head again. Deadly virus.

14 Zombies.” 2012 P. 441

15 **Covet:** “The intake guards, or whatever you call them, are the creepiest-looking  
16 people I have ever seen. Zombies?” P. 441

17 19) Guards with translucent skin

18 **BMR:** “...they were reminiscent of the guards portrayed in ancient Egyptian tomb  
19 paintings...their skin was mahogany brown but somehow translucent...” 2012 P. 443

20 **Covet:** “The intake guards...grayish, nearly translucent skin.” P. 441

21 20) Lighthouse / Library of Alexandria

22 **BMR:** “...like the Hanging Gardens of Babylon or the Lighthouse of Alexandria.”  
23 2016 P. 94

24 **Covet:** “And not just a regular community library. Like the Library of Alexandria.”  
25 P. 359

26 21) To the victor go the spoils

27 **BMR:** ““To the victor go the spoils,’ he murmured.” 2011 P. 557

28 **Covet:** “To the victor, go the spoils, right Hudson?” P. 503

1           22)    Like a fortune teller

2       **BMR:** “I ask, just like any love-sick girl at a fortune-teller’s booth.” 2013 P. 433-  
3 434

4       **Covet:** “Like I’m at one of those fake fortune-tellers who just give people what they  
5 want to hear.” P. 112

6           23)    Tower Card in the Tarot – there are 78 cards, the heroine draws the same  
7 one in both books

8       **BMR:** “The Tower. Not good... tower leans on its side stricken by a lightning  
9 bolt...” 2011 P. 6

10       **Covet:** “‘Trouble,’ ...studies the card that looks like a tower being struck by  
11 lightning.” P. 540

12           24)    Heroine is told there is more to her than meets the eye

13       **BMR:** “Unfortunately, there is more to you than meets the eye...” 2011 P. 567

14       **Covet:** “Apparently there’s a lot more to you than meets the eye.” P. 595

15           25)    A mother character in the scene mentions the “life debt”

16       **BMR:** “I owe you a life debt for what you did today.” 2013 P. 336

17       **Covet:** “You owe me a life debt, vampire.” P. 645

18           26)    Heroine says to herself, careful what you wish for

19       **BMR:** “Aunt Brynne always says to be careful what you wish for...” 2013 P. 259

20       **Covet:** “Be careful what you wish for and all that...” P. 108

21           27)    Heroine has a smell as a magical being

22       **BMR:** “I can smell the demon in you.” 2014 P. 329

23       **Covet:** “...I definitely smell the gargoyle in you...” P. 229

24           28)    Heroine has been kept “ignorant” of the magical world by parents in  
25 order to “protect” her

26       **BMR:** “...contact with the magical world. I thought if I could keep you from it, I  
27 would protect you and save myself. Instead, by keeping you ignorant...” 2013 P. 467

28       **Covet:** “They knew there was magic in this world... They kept me ignorant...” P.

600 "...they did the best they could to protect me." P. 602 (By not telling her of the magical world).

29) Heroine has felt out of place her whole life

**BMR:** "I've felt out of touch, out of place, my whole life." 2012 P. 81; 2011 P. 448; 2013 P. 89

**Covet:** "...I felt odd, out of place, a fish out of water in my own body...and in my own life." P. 600

30) Balance, two sides of the same coin, balance, harmony

**BMR:** "I understand that the balance is harmony, an accord of light and dark...they're two sides of the same coin; each opposite is essential to maintain the balance and rhythm of life on earth." 2013 P. 90

**Covet:** "But the universe requires balance...each a different side of the same coin." P. 392 "Both sides...unable to live in any kind of harmony or balance..." P. 395

31) Heroine wonders "how am I supposed to" restore the balance

**BMR:** 'You will need to balance both...' 'And just how am I supposed to do all that?' I say it like there's no way he can possibly be serious. I'm just one person.' 2012 P. 217; 2013 P. 220-221

**Covet:** "And if so, am I supposed to find a way to bring balance back? The idea seems absurd on its face. It's a lot to process..." P. 399

32) Magical tattoos are sparkly / bright and they "swirl" and "dance"

**BMR:** "...something sparkly caught the light...Tattoos!... swirling in a strange dance." 2011 P. 362

"They're swirling and dancing around my fingers and I can feel the...magic" 2013 P. 338

**Covet:** "...captured by the tattoo that's so bright now, it's practically blinding as it swirls and dances..." P. 605

33) Tattoo burns heroine

1 **BMR:** “And when I did, my back lit up on fire, thousands of tiny pin pricks.” 2011 P.  
2 436 (tattoo is on her neck and back)

3 **Covet:** “My tattoo burns as the magic lights each tiny needle prick...” P. 623

4 34) She “breathes him in” like “coming home”

5 **BMR:** “I breathed him in and knew that I was home.” 2011 P. 414

6 **Covet:** “I...just breathe him in. It feels like coming home.” P. 207

7 35) Heroine wonders if romantic lead can hear her heart it’s so loud

8 **BMR:** “My heart thundered loudly in my chest. Surely he could hear it?” 2011 P. 259

9 **Covet:** “My heart is pounding so hard in my chest, I’m certain he can hear it.” P. 132

10 36) An “invisible string” connects heroine and romantic lead

11 **BMR:** “But he’s not just any boy...It feels as though we’re tied together by an  
12 invisible string. Fated...from the moment we first met, he looked at me as if he knew  
13 me, and I felt the same.”

14 2016 P. 99 - 100

15 **Covet:** “Especially considering we’re mated. Already, I can feel the invisible string  
16 stretching between us, connecting us to each other on a soul-deep level.” P. 31

17 37) Heroine in New York City with her mom for the arts

18 **BMR:** “We were in New York City...for my mom’s art show.” 2010 P. 114; 2011 P.  
19 127

20 **Covet:** “...strolling through New York City...My mom was a huge Broadway  
21 musical fan... after I graduated, we’d come spend a week in New York.” P.  
22 369

## 23 D. COURT (BOOK 4)

24 1) There’s no time like the present

25 **BMR:** “Well, there’s no time like the present.” 2011 P. 86

26 **Court:** “There’s no time like the present.” P. 143  
27  
28

2) God of Chaos

**BMR:** "...the God of Chaos himself." 2016 P. 104

**Court:** "The God of Chaos." P. 159

3) Gaelic

**BMR:** "You know Gaelic?" 2010. P. 264

**Court:** "Gaelic?" P. 45

4) Heroine is owed a debt for saving a life

**BMR:** "This clan owes you a debt, Anna. Thank you for saving my Caitie's life..."

2011 P. 429

**Court:** "Thank you Grace... You saved my son and that is a debt..." P. 577

5) Heroine says what could go wrong

**BMR:** "What could possibly go wrong?" 2011 P. 510

**Court:** "What could go wrong...?" P. 523

6) Prada

**BMR:** "Did you wear the new Pradas tonight?" 2011 P. 340; "...Prada lace-up boots." P. 481

**Court:** "...bloodred Prada suit..." P. 430

7) Hawaii vacation

**BMR:** "...were decked out in Hawaiian leis...returned from vacation..." 2011 P. 325

**Court:** "The vacation in Hawaii must be over..." P. 391

8) Heroine says million dollar question

**BMR:** "Well, wasn't that the million dollar question?" 2011. P. 27

**Court:** "It's the million-dollar question." P. 5

9) Romantic lead has million dollar smile

1 **BMR:** “And then he just grinned that million-dollar smile of his. 2011 P. 47

2 **Court:** “He’s grinning down at me... the corners of that million-dollar smile of his.  
3 P. 134

4  
5 10) Mother to daughter

6 **BMR:** “An unbroken chain...mother to daughter back to the first queen of Egypt, to  
7 the Great Mother Isis herself.” 2016 P. 104

8  
9 **Court:** “That kind of ancient magic, passed down from mother to daughter won’t be  
10 held back...” P. 475

11  
12 11) Am I missing something

13 **BMR:** “Am I missing something?” 2011. P. 493

14 **Court:** “Am I missing something?” P. 590

15  
16 12) Puzzle pieces

17 **BMR:** “I asked, feeling more of the puzzle pieces snap into place.” 2010 P. 194

18 **Court:**” I can tell he’s suddenly putting together the puzzle pieces we’ve got in the  
19 same way that I have. P. 436

20  
21 13) Aunt says to heroine there’s magic in your veins / blood

22 **BMR:** “There’s magic in your veins.” 2011 P. 440

23 **Court:** “There’s magic in your blood. P. 477

24  
25 14) Magic calls to magic

26 **BMR:** Magic calling to magic. 2011 P. 255

27 **Court:** Like magic calls to like magic. P. 181



15) Plan B, plan C / G

**BMR:** “Plan B is shot down. I need a plan C.” 2013 P. 270

**Court:** “What’s plan B? Or are we on plan G now.” P. 215

16) Heroine uses every ounce of will power not to move

**BMR:** “Using every ounce of willpower that remained to me, I stayed firmly planted...” 2011 P. 499

**Court:** “...it takes every ounce of willpower I have not to whirl around...” P. 541

17) Heroine wonders about romantic lead, what if our roles were reversed

**BMR:** “What if our roles were reversed?” 2013 P. 170

**Court:** “I would feel... the same way if our roles were reversed and....P. 127

18) Heroine says look like sucked a lemon

**BMR:** “She looked like she’d sucked a lemon when...” 2011 P. 335

**Court:** “...queen looking like they’ve spent the last hour sucking on a bunch of really sour lemons.” P. 86

19) Born in ten generations/ thousand years

**BMR:** “She is said to be the most powerful of her kind born in ten generations.” 2012 P. 207

**Court:** “Grace was the only gargoyle born in a thousand years.” P. 164

20) Heroine’s frazzled nerves

**BMR:** “My aunt’s warm, brown eyes were welcoming and right now too friendly for my frazzled nerves. 2011 P. 66

**Court:** “It’s that understanding that finally calms my frazzled nerves...” P. 189

28) Stonehenge: energy, vortex, structure, harness

**BMR:** “There’s an energy vortex here... the Earth’s energy is particularly concentrated... They built structures to mark them, like Stonehenge... These structures were placed at specific equidistant points as a means of harnessing energy and are used as portals...” 2011 P. 243

**Court:** “This **structure** looks like it could have been built five thousand years ago....Freaking **Stonehenge**.” P. 588 “Hudson waves a hand at the circle of stone pillars in the middle of the field....**Stonehenge**...his original ability was channeling **energy**, right?”...Likely he can **harness** lightning ...Remy will **portal** the rest of us over and punch through it. P. 594-595

29) Queen of Shadows, Shadow Queen

**BMR:** “The **Queen of Shadows!**” 2014 P. 355

**Court:** “We know how to reach the **shadow queen**...” P. 676

30) Win win

**BMR:** “Either way, **it’s a win-win.**” 2011 P. 549

**Court:** “So I call **it a win-win.**” P. 585

33. Defendants’ display, distribution, and sales of the offending *Crave* books constitute infringement of Freeman’s rights under the Copyright Act.

34. As a direct and proximate result of said Defendants’ copyright infringement, Freeman has suffered and will continue to suffer harm, some of which cannot be reasonably and adequately measured or compensated in damages.

35. By reason of the foregoing, Freeman is further entitled to damages she has sustained and will sustain in the future, and any profits of said Defendants as a result of the infringements, in an amount to be ascertained at trial.

### **PRAYER FOR RELIEF**

Wherefore, Plaintiff prays for judgment as follows:

- a. That Defendants—each of them—and their respective agents and servants be enjoined from importing, manufacturing, distributing, offering for sale, selling or otherwise trafficking in any of the books entitled *Crave*, *Crush*, *Covet*, or *Court*;
- b. That Plaintiff be awarded all profits of Defendants, and each of them, plus compensatory damages, the exact sum to be proven at the time of

1 trial, or, if elected before final judgment, statutory damages as available  
2 under the Copyright Act, 17 U.S.C. § 101 et seq.;

3 c. That Plaintiff be awarded its attorneys' fees as available under the  
4 Copyright Act U.S.C. § 101 et seq. ;

5 d. That Plaintiff be awarded pre-judgment interest as allowed by law;

6 e. That Plaintiff be awarded the costs of this action; and

7 f. That Plaintiff be awarded such further legal and equitable relief as the  
8 Court deems proper.

9  
10 Plaintiff demands a jury trial on all issues so triable.

11  
12 Dated: April 18, 2023

Respectfully submitted,

13 By: /s/ Stephen M. Doniger  
14 Stephen M. Doniger, Esq.  
15 Kelsey Schultz, Esq.  
16 DONIGER / BURROUGHS  
17 Attorneys for Plaintiff  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28